

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 13 through 25, 38 through 50, 63 through 75, 83, and 85 through 174 are pending, with Claims 13, 38, 39, 40, 41, 63, 64, 65, 66, 83, 139, 156, and 172 being independent. Claims 38 through 50, 63 through 75, 83, 85 through 99, 104 through 125, and 130 through 138 have been allowed. Claim 20 was indicated as being allowable if rewritten in independent form, and has been respectfully maintained in dependent form as Applicants earnestly believe that the claim from which it depends will be found allowable. Claims 17, 21, 22, and 25 have been amended. Claims 139 through 174 have been added.

Claims 13 through 19, 21 through 25, 100 through 103 and 126 through 129 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,259,513 (Gallatin, et al.). All rejections are respectfully traversed.

Each of Claims 13, 139, and 156 recites, inter alia, illuminating a mask with light of a predetermined wavelength under a first mask-illumination condition to print a first pattern on a predetermined exposure region, and illuminating the mask with light of the predetermined wavelength under a second mask-illumination condition to print a second pattern on the predetermined exposure region, with:

(a) Claim 139 further reciting that exposures with the first and second exposure means are carried simultaneously; and

(b) Claim 156 further reciting that the lights used by the first and second exposure means have substantially mutually orthogonal polarization directions.

Claim 172 recites, inter alia, illuminating the mask with first light having a first polarization direction and illuminating the mask with second light having a second polarization direction being substantially orthogonal to the first polarization direction, the first and second exposure being carried out substantially simultaneously.

However, Applicants respectfully submit that Gallatin, et al. fails to disclose or suggest at least the above-discussed claimed features as recited, inter alia, in Claims 13, 139, 156, and 172. In this regard, Applicants respectfully submit that in Gallatin, et al., pattern regions 52, 54, 56, and 58 are printed on different exposure regions, and that there is no mention of polarization as claimed. Applicants further respectfully submit that there has been no showing of any indication of motivation in the cited document that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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